

# **AEROTEST OPERATIONS, INC.**

3455 FOSTORIA WAY • SAN RAMON, CA 94583 • (925) 866-1212 • FAX (925) 866-1716

**Docket No. 50-228**

RE: 10 C.F.R. § 50.80(a)

February 2, 2010

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Aerotest Radiography and Research Reactor  
License No. R-98  
Amended Request for Order for Indirect Transfer of License**

On January 7, 2010, a request (the "Transfer Request") was submitted pursuant to 10 C.F.R. § 50.80(a) and asked the U.S. Nuclear Regulatory Commission provide written consent to the indirect transfer of control of License No. R-98, which authorizes operation of the Aerotest Radiography and Research Reactor ("ARRR"), by Aerotest Operations, Inc. ("Aerotest"), Autoliv ASP, Inc. (current parent corporation of Aerotest) ("Seller"), and X-Ray Industries, Inc. ("Buyer") (collectively, the "Parties"). The transfer of this license is requested in connection with the potential stock sale of Aerotest from Seller to Buyer. The Transfer Request was supplemented by additional information submitted in letters from Aerotest and the Buyer on January 19, 2010.

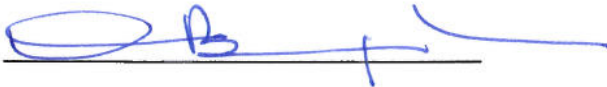
This letter amends the Transfer Request to identify that only the transfer of the stock of Aerotest is currently planned. The Transfer Request stated that Seller intends to sell the all the stock in Aerotest to Buyer upon completion of commercial negotiations and the Parties intended to consummate the transaction by the transfer from Seller to Buyer of all stock in Aerotest and its parent holding companies; OEA Aerospace, Inc., a California corporation and OEA, Inc., a Delaware corporation; to Buyer. For tax reasons, the Seller now intends only to transfer all the stock in Aerotest to the Buyer. Stock in the parent holding companies, OEA Aerospace, Inc. and OEA, Inc., will not be transferred. As these two holding companies have no assets other than their interest in Aerotest, no material change in the nature of the transaction results from this amendment of the Request.

On January 19, 2010, Aerotest submitted an affidavit pursuant to 10 C.F.R. § 2.390 requesting that information in the Transfer Request be withheld from public disclosure. The reasons stated in that affidavit also apply to this letter. Aerotest also requests that this letter similarly be withheld from public disclosure.

I, Dario Brisighella, hereby certify that the content of this letter contains information that is true and correct to the best of my knowledge.

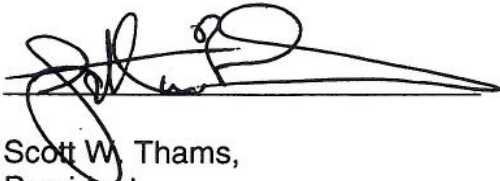
If you have any questions regarding this submittal, please contact Michael S. Anderson, Secretary of Aerotest at (248) 475-0442 or [mike.anderson@autoliv.com](mailto:mike.anderson@autoliv.com), or Robert B. Haemer, counsel to Aerotest, at (202) 663-9086 or [robert.haemer@pillsburylaw.com](mailto:robert.haemer@pillsburylaw.com).

Sincerely,



Dario Brisighella  
President,  
Aerotest Operations, Inc.

On behalf of X-Ray Industries, Inc., I certify that the content of this letter contains information that is true and correct to the best of my knowledge.



Scott W. Thams,  
President,  
X-Ray Industries, Inc.

cc: U.S. NRC Office of Nuclear Reactor Regulation/NRLPO  
U.S. NRC Region IV, Regional Administrator  
NRC, NRR (C. Montgomery)  
NRC, OGC (C. Safford)